

Exhibit 17

1 S. Bellino

2 A. Yes.

3 Q. Would those records show the quantity of
4 non-hazardous industrial waste that was being
5 delivered to these locations?

6 A. More than likely, yes.

7 Q. From December 2009 to now, has Liberty
8 delivered non-hazardous industrial waste to any
9 facility other than Jamaica Recycling or Clean Water
10 of New York?

11 A. I don't recall.

12 Q. Can you go to the second page of Exhibit
13 22. There is an e-mail sent 4:10 p.m. on March 28,
14 2016.

15 Do you see that?

16 A. Yes, I see it.

17 Q. That's an e-mail from Liberty Ashes to
18 someone at Clean Water of New York, correct?

19 A. Yes.

20 Q. Who sent that e-mail?

21 A. I'm not sure.

22 Q. Is "MB" Michael Bellino?

23 A. Yes.

24 Q. Do you think your brother sent this
25 e-mail?

1 S. Bellino

2 Q. Why do you think they pull a lot of
3 recyclables out of Liberty's freight? Did someone
4 tell you that?

5 A. Yes.

6 Q. Who told you that?

7 A. I don't recall.

8 Q. Was it someone from Covanta?

9 A. Yes.

10 Q. Do you recall when you were told this?

11 A. It's a long time ago.

12 Q. Does Liberty primarily deliver
13 non-recyclables to Covanta?

14 MR. SMITH: Objection. You can answer.

15 A. Liberty delivers non-recyclables to
16 Covanta.

17 Q. So what they are pulling out is
18 recyclables that are mixed in with non-recyclables?

19 A. I believe so.

20 Q. Does Covanta pay Liberty for the
21 recyclables it extracts from Liberty's deliveries?

22 A. No.

23 Q. The non-recyclables are converted to
24 energy on site in New York, correct?

25 A. I believe so.